

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HILDA SEMERDJIAN,

Plaintiff,

- v -

MCDUGAL LITTELL, A DIVISION OF
HOUGHTON MIFFLIN COMPANY, AND
R.R. DONNELLEY & SONS COMPANY,

Defendants.

07-CV-7496 (LMM)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Evan S. Greene, Esq., sworn to November 17, 2008, with exhibits, the accompanying memorandum of law, and all other papers and proceedings had herein, defendants McDougal Littell, a Division of Houghton Mifflin Company (“McDougal”) and R.R. Donnelly & Sons Company (“Donnelly”) will move this Court before the Honorable Lawrence M. McKenna, U.S.D.J., Room 15D, United States Courthouse, 500 Pearl Street, New York, NY at a date and time to be set by the Court for an Order, pursuant to Rule 702 of the Federal Rules of Evidence, *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993) and its progeny, excluding the opinion testimony proffered by plaintiff’s damages expert, Sonia Wasco (“Wasco”), and for such other and further relief as this Court deems just and proper.

Date: November 17, 2008

PROSKAUER ROSE LLP

By: /s/ Charles S. Sims

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R.R. Donnelley & Sons, Company*